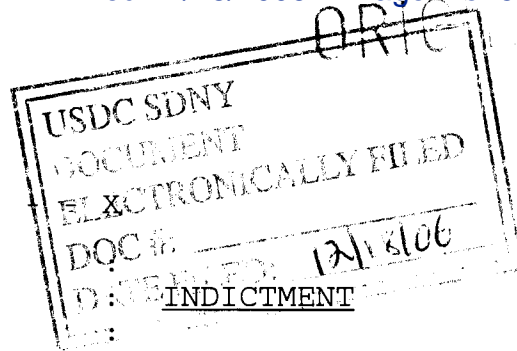


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

ANTHONY KIRKLAND,
a/k/a "Anthony Grant,"
a/k/a "Slim,"

Defendant.

: 06 Cr. ____

: **06 CRIM 1150**

: X

COUNT ONE

The Grand Jury charges:

1. From at least in or about June 2005, until at least in or about January 2006, in the Southern District of New York and elsewhere, ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B).

JUDGE CHIN

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about June 30, 2005, ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, and other co-conspirators not named as defendants herein, provided approximately 19 grams of cocaine base to a confidential informant ("CI-1") in the Bronx, New York, in exchange for United States currency.

b. On or about December 1, 2005, KIRKLAND, and another co-conspirator not named herein, provided cocaine base to CI-1 in the Bronx, New York, in exchange for United States currency.

c. On or about December 13, 2005, KIRKLAND provided cocaine base to CI-1 in the Bronx, New York, in exchange for United States currency.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. On or about June 30, 2005, in the Southern District of New York and elsewhere, ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, unlawfully,

intentionally, and knowingly distributed and possessed with intent to distribute a controlled substance, to wit, approximately 19 grams of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B); Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about December 1, 2005, in the Southern District of New York and elsewhere, ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, unlawfully, intentionally, and knowingly distributed and possessed with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C); Title 18, United States Code, Section 2.)

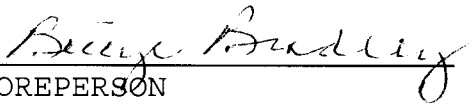
COUNT FOUR


The Grand Jury further charges:

6. On or about December 13, 2005, in the Southern District of New York and elsewhere, ANTHONY KIRKLAND, a/k/a "Anthony Grant," a/k/a "Slim," the defendant, unlawfully, intentionally, and knowingly distributed and possessed with intent to distribute a controlled substance, to wit, mixtures and

substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C); Title 18, United States Code, Section 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANTHONY KIRKLAND,
a/k/a "Anthony Grant,"
a/k/a "Slim,"

Defendant.

06 Cr.

INDICTMENT

(Title 21, United States Code, Sections
812, 841(a), 841(b)(1)(B), 841(b)(1)(C),
846; Title 18, United States Code,
Section 2)

MICHAEL J. GARCIA
United States Attorney

A TRUE BILL.


Foreperson.

12/18/06

SAH

Indictment filed under seal. A/W issued.

Fox, J.